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19 HULSTROM

20 *Additional counsel on following page*

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

SIGMA BETA XI, INC.; ANDREW
M., by and through his next friend
DENISE M., on behalf of himself and
all others similarly situated; JACOB
T., by and through his next friend
HEATHER T., on behalf of himself
and all others similarly situated; J.F.,
by and through her next friend CINDY
McCONNELL, on behalf of herself
and all others similarly situated,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; MARK
HAKE, Chief of the Riverside County
Probation Department, in his official
capacity; BRYCE HULSTROM, Chief
Deputy of the Riverside County

Case No. 5:18-cv-01399-JGB-JEM

CLASS ACTION

**ADDENDUM TO CLASS ACTION
SETTLEMENT AGREEMENT**

Complaint Filed: July 1, 2018
Final Approval of Class Settlement
Granted: June 22, 2020

Judge: Hon. Jesus G. Bernal
Mag. Judge: John E. McDermott

1 Probation Department, in his official
2 capacity,

3 Defendants.
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23 Attorneys for Plaintiffs

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1 **ADDENDUM TO CLASS ACTION SETTLEMENT AGREEMENT**

2 Pursuant to Section XX.B of the Settlement Agreement and Release
3 ("Settlement Agreement") in the above captioned case, this Addendum is entered into
4 by the parties to the Settlement Agreement to modify select provisions of the
5 Settlement Agreement as described herein. The Settlement Agreement remains in
6 effect except to the extent it is conflict with this Addendum.

- 7 1. All terms in this Addendum have the same meanings as in the Settlement
8 Agreement.
9 2. Section IV.G of the Settlement Agreement is hereby revised to include the
10 following:

11 H. On December 20, 2019, the Juvenile Court for the County of Riverside in
12 Case Number SWJ1900571 Ordered that "Any youth involved in the Youth
13 Accountability Team ("YAT") Program and/ or any other non- court- ordered
14 probation supervision program, who is within the jurisdiction of the juvenile
15 court, shall be appointed counsel at no cost for purposes of the youth's
16 involvement in the YAT Program and/ or any other non-court- ordered
17 probation supervision program only."

18 This Order became effective upon execution of the Order Granting Plaintiffs'
19 Motion for Final Approval of Class Action Settlement in the Federal Action.

20 A copy of the Juvenile Court's Order in this regard is attached hereto as Exhibit
21 "E".

- 22 3. Section X.D of the Settlement Agreement is hereby revised to provide as
23 follows:

24 D. Within 180 days of the Effective Date of Settlement, the Probation
25 Department shall create a mandatory training plan reflecting that all personnel
26 assigned to administer the YAT Program or any other non-court ordered
27 supervision program, and personnel assigned to juvenile intake functions, shall
28 receive training in the areas of "Engaging Youth for Better Probation
Outcomes" and "Advancing Probation Practice" as outlined and identified by
Scott MacDonald and Naomi Goldstein. Scott MacDonald and Naomi
Goldstein shall coordinate and lead the training on a yearly basis beginning in
FY 2020/2021.

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2 4. Section X.D(2) of the Settlement Agreement is hereby revised to provide as
3 follows:

4 (2) Initial training will commence in training year FY 2020/2021 and will
5 consist of two eight (8) hour blocks. Scott MacDonald and Naomi Goldstein
6 will assist the Probation Department in seeking Standards and Training for
7 Corrections-certification for this instruction.

8 5. Section X.D(4) of the Settlement Agreement is hereby revised to provide as
9 follows:

10 (4) A four-hour refresher training for each course will be held annually
11 beginning in FYI 2021/2022 and continuing through the end of FY 2024/2025
12 for staff who are assigned to the YAT Program or any other non-court ordered
13 supervision program, and to juvenile intake functions.

14 6. Sections XIII.A(3) and (4) of the Settlement Agreement are hereby revised to
15 provide as follows:

16 A. Within 180 days of the Effective Date of Settlement, the Probation
17 Department shall:

18 (3). Identify all youth who were referred to and/or placed on a YAT
19 contract under the jurisdiction of Welfare & Institutions Code § 602.
20 YAT case files for such youth will be maintained or sealed in accordance
21 with Welfare & Institutions Code § 781 and § 786.5.

22 (a) For the 23,717 youth the Riverside County Probation
23 Department has deemed to have "successfully completed" the
24 YAT Program, pursuant to Welfare & Institutions Code § 786.5,
25 the Riverside County Probation Department shall seal the YAT
26 Program case file records in its custody relating to all of the 23,717
27 youth referred to, and/ or who participated in, the YAT Program.

28 The Riverside County Probation Department shall also notify all
29 public or private agencies involved in operating the YAT Program
30 to seal the YAT Program case file records in the custody of those
31 agencies relating to all of the 23,717 youth's referral and
32 participation in the YAT Program in accordance with Welfare &
33 Institutions Code § 786.5. These agencies shall promptly seal all
34 such records in accordance thereto.

Pursuant to Welfare & Institutions Code § 786.5, upon such sealing of any records of these 23,717 youth, the arrest or offense giving rise to the youth's participation in the program shall be deemed not to have occurred and the youth may respond accordingly to any inquiry, application, or process in which disclosure of this information is requested or sought.

A copy of the Juvenile Court's Order in this regard is attached hereto as Exhibit "F". This Order became effective upon execution of the Order Granting Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal Action.

(b) For the approximately 2,600 records related to youth who were unsuccessful or withdrew from the YAT program, some of these youth may be eligible for record sealing under Welfare & Institutions Code § 781, after the filing of a petition, assessment by the District Attorney, and a possible Court hearing has occurred.

A process has been established whereby the names and information related to each of the approximately 2,600 petitions have been provided to Burns & Oblachinski, counsel retained by the County to represent the approximately 2,600 youth who were unsuccessful or withdrew from the YAT program for the purpose of possibly sealing the YAT records under Welfare & Institutions Code § 781. Burns & Oblachinski will review each matter and will file a petition for sealing of YAT records under Welfare & Institutions Code § 781 where appropriate. The petition will be reviewed by the District Attorney's office and potentially objected to. If no objection is filed, the Court may approve the sealing of the youth's specific YAT program file for which the petition was filed. If an objection is filed, the Court will set the matter for hearing.

(4) Notify all youth who were referred to and/or placed on a YAT contract under the jurisdiction of Welfare & Institutions Code § 601 and their parent or guardian that the youth continues to be eligible for diversion under Welfare & Institutions Code § 654. This notification shall be done by: (1) Amending the Final Notice of Class Settlement to include one sentence indicating that "All youth who were referred to and/or placed on a YAT contract under the jurisdiction of Welfare &

Institutions Code § 601 continue to be eligible for diversion under Welfare & Institutions Code § 654"; (2) Including the aforementioned provision in the Addendum to Class Action Settlement Agreement as set forth herein; (3) Posting of the Final Notice and Addendum to Class Action Settlement Agreement on the County, Probation, and Class Counsels' websites within 7 days of the Court's approval of the Addendum to Class Action Settlement Agreement; and (4) Distributing copies of the Final Notice and Addendum to Class Action Settlement Agreement to the Juvenile Defense Panel and the District Attorney's Office within 7 days of the Court's approval of the Addendum to Class Action Settlement Agreement.

7. Section XIV(B) of the Settlement Agreement is hereby revised to include the following:

(7) On December 20, 2019, the Juvenile Court for the County of Riverside in Case Number SWJ1900571 Ordered that "third-party Monitors stipulated to by the Parties shall be permitted access to the Youth Accountability Team ('YAT') Program case files for all youth in the YAT Program or any other non- court-ordered probation supervision program to ensure Defendants' compliance with the Agreement, subject to the following conditions: 1) any reports prepared by the third-party Monitors shall not include any of the juveniles' names or personally identifying information; 2) any reports prepared by the third-party Monitors shall not include any individual YAT case file, or part thereof, as an attachment, addendum or exhibit to the report, and 3) the Parties shall use the following notice which currently exists in the Notice to the Class in the Federal Action, provided to this Court, which advises Class Members that, 'The County will regularly collect and analyze data around the referrals, participation, and outcomes for youth who are placed in the YAT program. The County will disaggregate all data to show any disparities by race / ethnicity, gender, age at time of alleged offense, and foster youth status. The County will publish a written, publicly available report each year sharing its analysis of this data.'"

A copy of the Juvenile Court's Order in this regard is attached hereto as Exhibit "G". This Order became effective upon execution of the Order Granting Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal Action.

8. Section XVI(A) of the Settlement Agreement is hereby revised to provide as follows:

A. Concurrently with their filing of this Agreement, Plaintiffs' Counsel shall apply to the Court for Preliminary Approval of the Settlement provided for in this Agreement and entry of a Preliminary Approval Order. Such Preliminary Approval will seek approval of a Notice to the Class, as well as a finding that the following satisfies the publication requirements of Rule 23 of the Federal Rules of Civil Procedure. The Parties agree that Defendants will contract with AB Data to create the Notice to the Class, and to create and implement the Notice Plan intended to reach a high percentage of Class Members. A copy of the Juvenile Court's Order authorizing the release to AB Data of the names and contact information for all youth who were referred to or have participated in the YAT Program is attached hereto as Exhibit "H". A description of the Notice Plan is attached as Exhibit D.

(SIGNATURES ON FOLLOWING PAGE)

1 **Accepted and Agreed to by:**
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Dated: August 20, 2020

6 By: /s/ Victor Leung
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ACLU FOUNDATION OF SOUTHERN
CALIFORNIA
Victor Leung

ACLU FOUNDATION OF NORTHERN
CALIFORNIA
Linnea L. Nelson

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
Sarah Hinger (Admitted *Pro Hac Vice*)

ACLU FOUNDATION OF SAN DIEGO AND
IMPERIAL COUNTIES
David Loy
Melissa Deleon

SHEPPARD, MULLIN, RICHTER
& HAMPTON LLP
Moe Keshavarzi
Andrea N. Feathers

NATIONAL CENTER FOR YOUTH LAW
Michael Harris

Attorneys for Plaintiffs

August 20, 2020

By: 
OFFICE OF COUNTY COUNSEL FOR THE
COUNTY OF RIVERSIDE
James E. Brown
Kelly A. Moran
Attorneys for Defendants

1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, KELLY A. MORAN, attest that all
2 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
3 content and have authorized the filing.

/s/ Kelly A. Moran

EXHIBIT E

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

DEC 202019

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11 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE,
12 AND BRYCE HULSTRÖM
Additional counsel on following page

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE - JUVENILE COURT**

SIGMA BETA XI, INC.; ANDREW M., by and through his next friend DENISE M., on behalf of himself and all others similarly situated; JACOB T., by and through his next friend HEATHER T., on behalf of himself and all others similarly situated; J.F., by and through her next friend CINDY MCCONNELL, on behalf of herself and all others similarly situated.

**[PROPOSED] ORDER OF THE
JUVENILE COURT REGARDING
APPOINTMENT AND PROVISION
OF DEFENSE COUNSEL TO
MINORS IN CONNECTION WITH
THE YAT PROGRAM AND ALL
NON-COURT-ORDERED
SUPERVISION PROGRAMS**

Presiding Judge: Hon. Judith C. Clark

Case No. SWJ1900571

23 COUNTY OF RIVERSIDE; MARK
24 HAKE, Chief of the Riverside County
25 Probation Department, in his official
26 capacity; BRYCE HULSTROM, Chief
Deputy of the Riverside County
Probation Department, in his official
capacity,

Defendants.

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18 Attorneys for Plaintiffs

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:**

2 Hearings on the Joint Stipulation and Petition filed by Plaintiffs Sigma Beta Xi,
3 Inc., Jacob T., J.F., and Andrew M., and Defendants County of Riverside (the
4 “County”), Mark Hake, and Bryce Hulstrom (together, the “Parties”) took place
5 before the Honorable Judith C. Clark, Superior Court Judge of Riverside County –
6 Southwest Juvenile Court on October 21, 2019, November 6, 2019, and December 6,
7 2019. After considering the papers filed by the Parties, oral argument, and the Order
8 Granting Plaintiffs’ Motion for Preliminary Approval of Class Action Lawsuit
9 Settlement issued by the Honorable Jesus G. Bernal, United States District Judge of
10 the Central District of California, in *Sigma Beta Xi, Inc, v. County of Riverside*, Case
11 No. 5:18-cv-01399-JGB-JEM (the “Federal Action”), on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that:

13 Any youth involved in the Youth Accountability Team (“YAT”) Program
14 and/or any other non-court-ordered probation supervision program, who is within the
15 jurisdiction of the juvenile court, shall be appointed counsel at no cost for purposes
16 of the youth’s involvement in the YAT Program and/or any other non-court-ordered
17 probation supervision program only.

18 This Court further recognizes that, pursuant to agreement and stipulation by the
19 Parties, at all times hereafter upon entry of this Order, all youths referred to and
20 involved in a non-court-ordered probation supervision program operated by the
21 County, including the YAT Program, must be provided counsel by the County, for
22 purposes of the youth’s involvement in the YAT Program and/or any other non-court-
23 ordered probation supervision program only, at no cost to the youth from the time the
24 youth is referred to the YAT Program or any other non-court-ordered probation
25 supervision program through the time that all documents related to the youth’s referral
26 to and/or participation in the YAT Program or any other non-court-ordered probation
27 supervision program are sealed and destroyed. The County has represented that it will
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1 furnish such counsel through the Juvenile Defense Panel. Counsel thus appointed for
2 the youth shall be provided access to all documents related to the youth's referral to
3 and/or participation in the YAT Program or any other non-court-ordered probation
4 supervision program, as necessary to represent the youth.

5 This Order shall become effective upon execution of the Order Granting
6 Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal
7 Action.

8 IT IS SO ORDERED.

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Dated: Dec. 13, 2019

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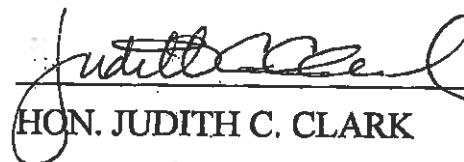
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HON. JUDITH C. CLARK

EXHIBIT F

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

DEC 202019

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11 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE,
12 AND BRYCE HULSTROM
Additional counsel on following page

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE - JUVENILE COURT**

SIGMA BETA XI, INC.; ANDREW
16 M., by and through his next friend
DENISE M., on behalf of himself and
17 all others similarly situated; JACOB
T., by and through his next friend
18 HEATHER T., on behalf of himself
and all others similarly situated; J.F.,
19 by and through her next friend CINDY
MCCONNELL, on behalf of herself
20 and all others similarly situated,

**[PROPOSED] ORDER OF THE
JUVENILE COURT REGARDING
SEALING OF YAT PROGRAM CASE
FILES UNDER WELFARE &
INSTITUTIONS CODE § 786.5**

Presiding Judge: Hon. Judith C. Clark

Case No. SWJ1900571

21 || Plaintiffs,

v₁

23 COUNTY OF RIVERSIDE; MARK
24 HAKE, Chief of the Riverside County
Probation Department, in his official
capacity; BRYCE HULSTROM, Chief
25 Deputy of the Riverside County
Probation Department, in his official
26 capacity,

Defendants.

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2 Hearings on the Joint Stipulation and Petition filed by Plaintiffs Sigma Beta Xi,
3 Inc., Jacob T., J.F., and Andrew M., and Defendants County of Riverside (the
4 "County"), Mark Hake, and Bryce Hulstrom (together, the "Parties") took place
5 before the Honorable Judith C. Clark, Superior Court Judge of Riverside County –
6 Southwest Juvenile Court on October 21, 2019, November 6, 2019 and December 6,
7 2019. After considering the papers filed by the Parties, oral arguments, and the Order
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement
9 issued by the Honorable Jesus G. Bernal, United States District Judge of the Central
10 District of California, in *Sigma Beta Xi, Inc, v. County of Riverside*, Case No. 5:18-
11 cv-01399-JGB-JEM (the "Federal Action"), on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that:

13 For the 23,717 youth the Riverside County Probation Department has deemed
14 to have "successfully completed" the Youth Accountability Team ("YAT") Program,
15 pursuant to Welfare & Institutions Code § 786.5, the Riverside County Probation
16 Department shall seal the YAT Program case file records in its custody relating to all
17 of the 23,717 youth referred to, and/or who participated in, the YAT Program.

18 The Riverside County Probation Department shall also notify all public or
19 private agencies involved in operating the YAT Program to seal the YAT Program
20 case file records in the custody of those agencies relating to all of the 23,717 youth's
21 referral and participation in the YAT Program in accordance with Welfare &
22 Institutions Code § 786.5. These agencies shall promptly seal all such records in
23 accordance thereto.

24 Pursuant to Welfare & Institutions Code § 786.5, upon such sealing of any
25 records of these 23,717 youth, the arrest or offense giving rise to the youth's
26 participation in the program shall be deemed not to have occurred and the youth may
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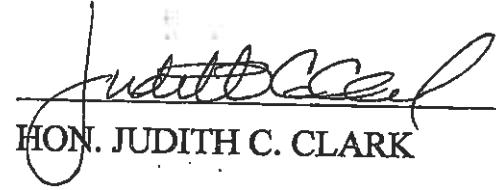
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1 respond accordingly to any inquiry, application, or process in which disclosure of this
2 information is requested or sought.

3 This Order shall become effective upon execution of the Order Granting
4 Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal
5 Action.

6 IT IS SO ORDERED.
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10 Dated: Dec. 13, 2019

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HON. JUDITH C. CLARK

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EXHIBIT G

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

DEC 20 2019

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11 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE,
12 AND BRYCE HULSTRÖM
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31

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE - JUVENILE COURT**

SIGMA BETA XI, INC.; ANDREW
16 M., by and through his next friend
DENISE M., on behalf of himself and
17 all others similarly situated; JACOB
T., by and through his next friend
HEATHER T., on behalf of himself
18 and all others similarly situated; J.F.,
by and through her next friend CINDY
19 MCCONNELL, on behalf of herself
20 and all others similarly situated.

**[PROPOSED] ORDER OF THE
JUVENILE COURT AUTHORIZING
ACCESS TO YOUTH
ACCOUNTABILITY TEAM
JUVENILE CASE FILES BY
MONITORS TO ENSURE THE
COUNTY'S COMPLIANCE WITH
THE TERMS OF THE SETTLEMENT
AGREEMENT IN THE FEDERAL
ACTION.**

21 Plaintiffs.

22

**Presiding Judge: Hon. Judith C.
Clark**

23 COUNTY OF RIVERSIDE; MARK
24 HAKE, Chief of the Riverside County
Probation Department, in his official
capacity; BRYCE HULSTROM, Chief
25 Deputy of the Riverside County
Probation Department, in his official
capacity.

Case No. SWJ1900571

27 Defendants

1 LINNEA L. NELSON (SBN 278960)
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24 SHEPPARD, MULLIN, RICHTER &
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Facsimile: (213) 977-5299

Attorneys for Plaintiffs

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:**

2 Hearings on the Joint Stipulation and Petition filed by Plaintiffs Sigma Beta Xi,
3 Inc., Jacob T., J.F., and Andrew M., and Defendants County of Riverside (the
4 "County"), Mark Hake, and Bryce Hulstrom (together, the "Parties") took place
5 before the Honorable Judith C. Clark, Superior Court Judge of Riverside County –
6 Southwest Juvenile Court on October 21, 2019, November 6, 2019, and December 6,
7 2019. After considering the papers filed by the Parties, oral argument, and the Order
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement
9 issued by the Honorable Jesus G. Bernal, United States District Judge of the Central
10 District of California, in *Sigma Beta Xi, Inc, v. County of Riverside*, Case No. 5:18-
11 cv-01399-JGB-JEM (the "Federal Action") on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:**

13 In accordance with Section XIV of the Parties' Settlement Agreement, the
14 third-party Monitors stipulated to by the Parties shall be permitted access to the Youth
15 Accountability Team ("YAT") Program case files for all youth in the YAT Program
16 or any other non-court-ordered probation supervision program to ensure Defendants'
17 compliance with the Agreement, subject to the following conditions: 1) any reports
18 prepared by the third-party Monitors shall not include any of the juveniles' names or
19 personally identifying information; 2) any reports prepared by the third-party
20 Monitors shall not include any individual YAT case file, or part thereof, as an
21 attachment, addendum or exhibit to the report, and 3) the Parties shall use the
22 following notice which currently exists in the Notice to the Class in the Federal
23 Action, provided to this Court, which advises Class Members that, "The County will
24 regularly collect and analyze data around the referrals, participation, and outcomes
25 for youth who are placed in the YAT program. The County will disaggregate all data
26 to show any disparities by race / ethnicity, gender, age at time of alleged offense, and

27

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1 foster youth status. The County will publish a written, publicly available report each
2 year sharing its analysis of this data.”

3 This Order shall become effective upon execution of the Order Granting
4 Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal
5 Action.

6 IT IS SO ORDERED.
7
8

9 Dated: Dec. 13, 2019

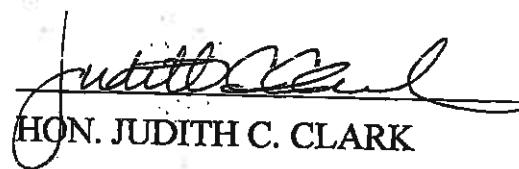
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11 HON. JUDITH C. CLARK
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EXHIBIT H

1 SYLVIA TORRES-GUILLÉN (SBN 164835)
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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

DEC 20 2019

9 Attorneys for Plaintiffs

AS Alamar

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DEC 20 2019

18 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE,
19 AND BRYCE HULSTRÖM

S

20 Additional counsel on following page

21
22 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
23 COUNTY OF RIVERSIDE - JUVENILE COURT

24 SIGMA BETA XI, INC.; ANDREW
25 M., by and through his next friend
26 DENISE M., on behalf of himself and
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HEATHER T., on behalf of himself
and all others similarly situated; J.F.,
by and through her next friend CINDY
MCCONNELL, on behalf of herself
and all others similarly situated,

[PROPOSED] ORDER OF THE
JUVENILE COURT AUTHORIZING
ACCESS TO JUVENILE NAMES AND
CONTACT INFORMATION BY AB
DATA TO PROVIDE NOTICE OF
THE CLASS SETTLEMENT
AGREEMENT IN THE FEDERAL
ACTION

Presiding Judge: Hon. Judith C.
Clark

Case No. SWJ1900571

21 Plaintiffs,
22 v.
23
24 COUNTY OF RIVERSIDE; MARK
25 HAKE, Chief of the Riverside County
26 Probation Department, in his official
27 capacity; BRYCE HULSTROM, Chief
28 Deputy of the Riverside County
Probation Department, in his official
capacity,

Defendants.

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18 Attorneys for Plaintiffs

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6 Juvenile Court on October 21, 2019, November 6, 2019, and December 6, 2019. After
7 considering the papers filed jointly by the Parties, oral argument, and the Order
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement
9 issued by the Honorable Jesus G. Bernal, United States District Judge of the Central
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11 cv-01399-JGB-JEM (the "Federal Action") on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:**

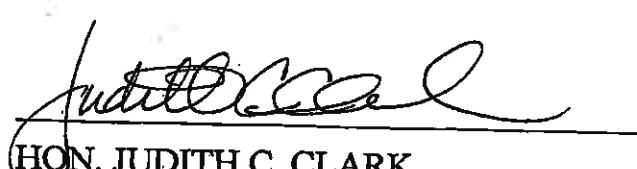
13 In accordance with Section XVI of the Parties' Settlement Agreement, AB Data
14 shall be permitted access to the names and contact information for all youth who were
15 referred to or have participated in the YAT Program to provide notice of the
16 settlement to Class Members, subject to the following conditions: 1) the names and
17 contact information for the aforementioned youth may only be used for the limited
18 purpose of providing notice of the settlement to the class members in the Federal
19 Action; 2) the information cannot be provided by AB Data to any other entity except
20 as necessary to effectuate mailing the notice to the class members in the Federal
21 Action, e.g., AB Data may indirectly share the information with the United States
22 Postal Service to effectuate delivery of the notice to the class members; and 3) the
23 information cannot be sold, shared, or disseminated in any other way by AB Data.

24 **IT IS SO ORDERED.**

25

26

Dated: Dec. 13, 2019



HON. JUDITH C. CLARK

27

28

PROOF OF SERVICE

United States District Court Case No. 5:18-cv-01399

I, the undersigned, say that I am a citizen of the United States and am employed in the county of Riverside, over the age of 18 years and not a party to the within action or proceeding; that my business address is: 3960 Orange Street, Suite 500, Riverside, CA 92501-3611.

On August 24, 2020, a true and correct copy of the foregoing document
entitled:

ADDENDUM TO CLASS ACTION SETTLEMENT AGREEMENT

was served on all parties pursuant to FRCivP 5(b) as follows:

SEE ATTACHED – SERVICE LIST

- TO BE SERVED BY THE COURT VIA THE NOTICE OF ELECTRONIC FILING (NEF). Pursuant to L.R. 5-3.2.3, the foregoing document will be served by the court via NEF and hyperlink to the document. I checked the CM/ECF docket for this case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the addresses stated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 24, 2020, at Riverside, California

W. J.

Michelle Quiroz

1 SERVICE LIST
2

3	Sylvia Torres-Guillén <u>storres-guillen@aclusocal.org</u> 4 Hannah Comstock <u>hcomstock@aclusocal.org</u> 5 American Civil Liberties Union Foundation of Southern California, Inc. 1313 W. 8 th Street Los Angeles, CA 90017 T: (213) 977-5220 F: (213) 977-5299 7 Attorneys for Plaintiff	Christine P. Sun <u>csun@aclunc.org</u> Linnea L. Nelson <u>lneslon@aclunc.org</u> American Civil Liberties Union Foundation of Northern California, Inc. 39 Drumm St. San Francisco, CA 94111 T: (415) 621-2493
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